

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

IN BUSINESS FOR TEAM
DEVELOPMENT, INC.

DEBTOR

IN BUSINESS FOR TEAM
DEVELOPMENT, INC.

PLAINTIFF

v.

DEPARTMENT OF THE TREASURY
DEPARTMENT OF THE COMMONWEALTH
OF PUERTO RICO,
JUAN CARLOS PUIG MORALES,
SECRETARY
DEFENDANTS

Case No.: 10-02207 (SEK)

CHAPTER 11

ADV. PROCEEDING: 10-00199

TAX REFUND AND OBJECTION
TO CLAIM

MOTION REQUESTING EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW, Defendant, the Treasury Department of the Commonwealth of Puerto Rico, without submitting to the Court's jurisdiction, through the Secretary of Justice, by the undersigned counsel, who appears for the sole purpose of this motion, and very respectfully avers and prays as follows:

1. That this Honorable Court has jurisdiction under Title 28 USC §1334, and venue under Title 28 USC §1408, and particularly regarding this matter under Title 11 USC §108, on Extension of Time, Rule 6 (b) of the Federal Rules of Civil

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Procedure and Rule 7001 *et seq.* of Federal Rules of Bankruptcy Procedure.

2. The Plaintiff filed an adversary proceeding against Movant - Defendant, under Rule 7001 *et seq.* of Federal Rules of Bankruptcy Procedure, on **December 10, 2010**. Please see **Bankruptcy CM/ECF Docket, under entry no. 1**.

3. The Summons were issued by the Honorable Court on **December 10, 2010**, and the Service was completed in accordance with Rule 7004 (b) (3), Federal Rules of Bankruptcy Procedure on **December 17, 2010**. **(An additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if were served by mail.**

4. In accordance with Rule 7012 of the Federal Rules of Bankruptcy Procedure the defendants shall serve an answer within 30 days after the issuance of the summons, which are due on January 19, 2011.

5. The appearing Defendant is still analyzing the Plaintiff's arguments and prepare the case. In spite of the undersigned best efforts, said analysis has not concluded.

6. To be able to adequately answer the complaint filed by the Plaintiff the Defendant is requesting the Honorable Court an extension of time of forty five (45) days, in accordance to Title 11 USC §108 for Extension of Time.

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7. The reasons for Defendant to request the extension of time is to make and verified the allegation in the complaint and to file a responsible and well-grounded answer to the Complaint.

8. The Defendant very respectfully requests to this Honorable Court to grant forty five (45) days to answer the complaint.

WHEREFORE, the Defendant, very respectfully request from this Honorable Court to grant this motion and extend the period of time that Defendant has to answer the complaint filed by the Plaintiff.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this date I filed this motion with the Clerk of the Bankruptcy court using the CM/ECF system, which will serve notice to all participants.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19 day of January 2011.

GUILLERMO SOMOZA COLOMBANI

Secretary of Justice of the Commonwealth
of Puerto Rico

GRISEL SANTIAGO CALDERÓN

Deputy Secretary of Justice
In Charge of Litigation

WANDYMAR BURGOS VARGAS

U.S.D.C. No. 223502
Director of Legal Affairs
Federal Litigation Division

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